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July 30, 2021

VIA ECF

Hon. Victor Marrero
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Nwosuocha v. Glover II et al., No. 1:21-cv-04047-VM

Dear Judge Marrero:

The undersigned counsel to Plaintiff Emelike Nwosuocha (“Nwosuocha”) herein writes the Court to request a discretionary enlargement of time to serve the Complaint in this matter upon the Defendants. This request is for good cause pursuant to Rule 4(m) of the Federal Rules of Civil Procedure (“Rule 4(m)”).

Pursuant to Rule 4(m), the 90-day deadline for service of the Complaint, which Nwosuocha filed on May 6, 2021, requires service on or by August 4, 2021. Nwosuocha respectfully asks the Court for a sixty (60) day enlargement of this period, placing the deadline to serve the Complaint in this matter on October 3, 2021.

The undersigned and Defendant Donald McKinley Glover, II’s (“Glover”) counsel, Jonathan Davis, have conferred on several occasions regarding a voluntary acceptance of service of the Complaint, coupled with a stipulated response date, and are working towards reaching an agreement. It is Mr. Davis’ understanding that other Defendants are currently in the process of solidifying legal representation. Once that process is complete, Plaintiff will request acceptance of

service of the Complaint through their counsel, thereby avoiding unnecessary incurrences of time and expense by way of process server(s).

Accordingly, as a sixty-day enlargement of the time for service advances the dual interests of affording the Defendants a sufficient opportunity to arrange representation and the conservation of time and resources, Nwosuocha respectfully requests that the Court grant an enlargement of the time for service the Complaint to October 3, 2021, for good cause under Rule 4(m).

Respectfully submitted,

AIDALA, BERTUNA & KAMINS, P.C.

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